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November 18, 2005

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Buckeye Telesystem, Inc. ("Buckeye TeleSystem") / Compliance Letter,
Nov. 28, 2005, WC Docket No. 05-196**

Dear Ms. Dortch:

We submit this Compliance Letter on behalf of Buckeye TeleSystem. As an initial matter, Buckeye TeleSystem applauds the Commission's efforts to ensure the safety of VoIP users, and is proud to report that it is in full compliance with the Commission's E911 rules. We detail Buckeye TeleSystem's compliance below.

Percentage of subscribers with 911 in compliance with the Commission's Rules:
100 percent.

Declaration as to Buckeye's assurance that 911 calls are being routed properly:
Buckeye is correctly routing calls to the appropriate authority using selective routers, the trunk lines between the selective router and the Public Safety Answering Points (PSAP), and other necessary elements of the wireline 911 network.

Number of Selective Routers: Buckeye currently is interconnected to the Perrysburg (OH) and Bowling Green (OH) Selective Routers.

Declaration that all 911 calls are being transmitted to all answering points capable of receiving and processing the information: Buckeye TeleSystem has tested its network with the Selective Routers and the PSAP in its service area, and these answering points have all properly received and processed Buckeye TeleSystem's ANI and registered location information. Further, Buckeye TeleSystem has not been notified of any problems with the transmission of this information. Accordingly, Buckeye TeleSystem believes that 100 percent of the answering points in its service area are capable of receiving and processing its ANI and registered location information.

Description of actions taken to ascertain subscriber's current registered location: Buckeye TeleSystem has obtained registered location information from 100 percent of its customers. At the time of installation, Buckeye TeleSystem technicians permanently fasten every customer's modem to the structure at the customer's place of business. Accordingly, there is no question as to the registered location of any of Buckeye TeleSystem's customers. A Buckeye TeleSystem's customer's registered location cannot change.

Further, Buckeye TeleSystem technicians visited every existing customer in August and September 2005, personally warned every customer of the limitations on E911 if the customer moved the modem, and provided every customer with warning stickers detailing the limitations on the E911 services, including that the customer's E911 service would not function properly if the modem were moved. Technicians affixed the warning stickers to every modem.

On an ongoing basis, Buckeye TeleSystem technicians warn every new customer of the limitations on the E911 services, show every new customer the warning sticker, and require every new customer to sign an acknowledgment that the customer has read and understood the limitations on Buckeye TeleSystem's E911 services.

Methods to update registered location. Because Buckeye TeleSystem's customers cannot move their VoIP services to a new location, there is no need for them to update their registered location. If a Buckeye TeleSystem's customer does want to move, it can call Buckeye TeleSystem's using its VoIP services, and Buckeye TeleSystem will arrange for a technician to install VoIP services at a new location.

Solutions for nomadic VoIP services: Buckeye TeleSystem has no nomadic VoIP customers because the customers' modems are permanently affixed at their registered location. Accordingly, Buckeye TeleSystem has no need for any automatic detection mechanisms to identify subscribers who move VoIP equipment.

Commitment not to accept new VoIP subscribers in areas where Buckeye TeleSystem cannot provide 911 services: Buckeye TeleSystem provides 911 services in all areas in which it offers VoIP service, so this is not an issue.

If you have any further questions, please contact me.

Regards,

Fritz Byers